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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

NATIONAL RIFLE ASSOCIATION OF AMERICA; JOHN DOE,

Plaintiffs,  
vs.

CITY OF LOS ANGELES; ERIC GARCETTI, in his official capacity as Mayor of the City of Los Angeles; HOLLY L. WOLCOTT, in her official capacity as City Clerk of the City of Los Angeles, and DOES 1-10,

Defendants.

Case No.: 19-cv-03212-SVW-GJS

**[PROPOSED] ORDER**

Ctrm: 10A-First Street Courthouse  
Judge: Hon. Stephen V. Wilson

Action Filed: April 24, 2019

1 The Court has considered the parties' stipulation to the following:

2 1. A Final Judgment of Permanent Injunction will be entered in favor of  
3 Plaintiffs incorporating the Court's 12/11/19 Order. A Proposed Judgment is attached as  
4 Exhibit A to the parties' stipulation;

5 2. Defendant shall remove the NRA disclosure requirement that was established  
6 by the repealed Ordinance, and all references thereto, from all forms;

7 3. Defendant will notify in writing each contractor who submitted a disclosure  
8 form to the City containing the NRA disclosure requirement that the Ordinance has been  
9 repealed, that they are no longer under any duty to comply with the NRA disclosure  
10 requirement, and that they need not make any such disclosure going forward. Defendant  
11 will inform Plaintiffs of the number of such notifications that have been sent out;

12 4. Defendant confirms that it has provided written notification to all City  
13 departments, employees, and vendors charged with implementing, administering, or  
14 enforcing the Ordinance that the Ordinance has been repealed in its entirety, that the  
15 Ordinance is no longer enforceable, and that the NRA disclosure requirement shall no  
16 longer be enforced;

17 5. Plaintiffs waive all their claims for damages in this litigation. Accordingly,  
18 the trial set for February 25, 2020 will be taken off calendar and all current discovery and  
19 pre-trial deadlines are vacated;

20 6. The parties shall attempt to negotiate in good faith an agreed upon sum of  
21 attorneys' fees and costs to be paid to Plaintiffs by Defendant, but if the parties are unable  
22 to agree upon a reasonable award of fees and costs, Plaintiffs shall file with the Court a  
23 noticed motion for attorney's fees and Application to the Clerk to Tax Costs;

24 7. In order to allow the parties enough time to conduct the negotiation  
25 referenced above (i.e., an agreed upon sum of attorney's fees and costs to be paid to  
26 Plaintiffs by Defendant), and to obtain any required client approval of the same, the  
27 deadlines for filing a motion for attorney's fees and an Application to the Clerk to Tax  
28 Costs shall be extended to April 30, 2020;

1           8.     In the event such a motion is filed, Defendant will not dispute Plaintiffs'  
2 entitlement to fees and costs, but expressly reserves the right to contest the amount of  
3 attorney's fees and costs that should be awarded.

4           The Court has found good cause shown by the parties and hereby orders the  
5 stipulation be granted. **IT IS SO ORDERED.**

6 Dated: \_\_\_\_\_, 2020  
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9 Honorable Stephen V. Wilson  
United States District Judge

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